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March 18, 2011

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VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd Chief Clerk and Administrator The Public Service Commission of South Carolina 101 Executive Center Drive Columbia, South Carolina 29210

- Re: Docket Number 2011-65-S
 - Joint Application for Approval of the Transfer of the Sewer Facilities, Territories, and Certificate of Public Convenience and Necessity of Alpine Utilities, Incorporated and Woodland Utilities, Incorporated to Palmetto Wastewater Reclamation, LLC and the Grant of a Certificate of Authority to Issue Securities
 - Happy Rabbit, a South Carolina Limited Partnership's Petition to Intervene

Dear Ms. Boyd:

Enclosed for filing is Happy Rabbit's Petition to Intervene, Coversheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/S/_____
Richard L. Whitt
Jefferson D. Griffith, III

RLW/cas

STATE OF SOUTH CAROLINA (Caption of Case) Joint Application for Approval of the Transfer of the Sewer Facilities, Territories, and Certificate of Public Convenience and Necessity of Alpine Utilities, Incorporated and Woodland Utilities, Incorporated to Palmetto Wastewater Reclamation, LLC and the)) BEFORE THE) PUBLIC SERVICE COMMISSION) OF SOUTH CAROLINA)) COVER SHEET)) DOCKET) NUMBER: 2011 - 65 - S			
(Please type or print Submitted by: Address:	Richard L. Whitt Jefferson D. Griff	ith, III	SC Bar Numb	er: <u>62895</u> 803-251-7442	2	
	Austin & Rogers,	P.A.	Fax:	803-252-3679)	
	508 Hampton Str	eet, Suite 300	Other:	·		
NOTE T	1	ntained herein neither replace		nitt@AustinRogersI		
☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously ☐ Other: Routine NATURE OF ACTION (Check all that apply)						
☐ Electric		☐ Affidavit	Letter		Request	
☐ Electric/Gas		Agreement	Memorano	lum	Request for Certificatio	
☐ Electric/Telecon	mmunications	Answer	☐ Motion		Request for Investigation	
☐ Electric/Water		Appellate Review	Objection		Resale Agreement	
☐ Electric/Water/	Telecom.	Application	Petition		Resale Amendment	
☐ Electric/Water/	Sewer	Brief	Petition fo	r Reconsideration	Reservation Letter	
Gas		Certificate	Petition fo	r Rulemaking	Response	
Railroad		Comments	Petition for	Rule to Show Cause	Response to Discovery	
⊠ Sewer		Complaint	Petition to	Intervene	Return to Petition	
☐ Telecommunica	ations	Consent Order	Petition to	Intervene Out of Time	Stipulation	
☐ Transportation		Discovery	Prefiled T	estimony	Subpoena	
Water		Exhibit	Promotion		☐ Tariff	
☐ Water/Sewer		Expedited Consideration	on Proposed	Order	Other:	
Administrative	Matter	☐ Interconnection Agreeme	ent Protest			
Other:		Interconnection Amendm	nent Publisher's	s Affidavit		
		Late-Filed Exhibit	Report			

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2011-65-S

IN RE:	Joint Application for Approval of the) PETITION TO
	Transfer of the Sewer Facilities,) INTERVENE
	Territories, and Certificate of Public) HITERIE
	Convenience and Necessity of Alpine)
	Utilities, Incorporated and Woodland)
	Utilities, Incorporated to Palmetto	j
	Wastewater Reclamation, LLC and the	1
	Grant of a Certificate of Authority to Issue)
	Securities)
		j

INTRODUCTION

A Docket was opened in this matter, on February 11, 2011, and assigned the above referenced Docket number. Happy Rabbit, a South Carolina Limited Partnership's (hereinafter as, "Happy Rabbit") Petition to Intervene, follows:

PETITION TO INTERVENE

- 1. Petitioner currently is a customer of Alpine Utilities, Incorporated (hereinafter as, "Alpine").
- 2. Happy Rabbit has concerns over the billing methods employed by Alpine. Happy Rabbit is billed on a monthly basis, for apartment units that are unoccupied. Happy Rabbit is also responsible for payment of all of its tenants' sewer bills. Happy Rabbit is also billed for sewer service in a building that does not have sewer facilities.
- 3. Petitioner Happy Rabbit is entitled to have these issues resolved, before any transfer is approved.
- 4. Petitioner Happy Rabbit's position is that it should be allowed to intervene in this Docket, with full rights of participation.

Respectfully Submitted,

/S/

Richard L. Whitt
Jefferson D. Griffith, III
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 300
Columbia South Carolina, 29201

March 18, 2011 Columbia, South Carolina 803-251-7442 Attorneys for Happy Rabbit, a South Carolina Limited Partnership

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I electronically mailed a copy of the Correspondence, Cover Sheet, Happy Rabbit's Petition to Intervene and this Certificate of Service, in the above referenced matter as indicated below, via electronic mail and U.S. Mail, as addressed below, on March 18, 2011. **Representing Woodland Utilities, Incorporated** Benjamin P. Mustian Willoughby & Hoefer, P.A. Title: Counsel **Post Office Box 8416 Columbia, SC 29202** Phone: 803-252-3300 Fax: 803-255-8062 bmustian@willoughbyhoefer.com Fax: 803-255-8062 bmustian@willoughbyhoefer.com Fhorence P. Belser Office of Regulatory Staff Florence P. Belser Office of Regulatory Staff Title: Counsel **Representing Palmetto Wastewater Reclamation, LLC John M.S. Hoefer Willoughby & Hoefer, P.A. Title: Counsel **Columbia, SC 29202-8416** Post Office Box 8416 Columbia, SC 29202-8416 Fax: 803-737-0800 Fax:	Joint Application for Approval Transfer of the Sewer Facilities and Certificate of Public Convolution Necessity of Alpine Utilities, In and Woodland Utilities, Incorp Palmetto Wastewater Reclama and the Grant of a Certificate of Authority to Issue Securities	s, Territories,) enience and) corporated) orated to) tion, LLC)	Docket No. 2011-65-S
this Certificate of Service, in the above referenced matter as indicated below, via electronic mail and U.S. Mail, as addressed below, on March 18, 2011. **Representing Woodland Utilities, Incorporated** **Benjamin P. Mustian** **Willoughby & Hoefer, P.A.** Title: Counsel** **Post Office Box 8416 Columbia, SC 29202** **Phone: 803-252-3300 Fax: 803-256-8062 bmustian@willoughbyhoefer.com** **Phone: 803-256-8062 bmustian@willoughbyhoefer.com** **Phone: 803-737-0800 Fax: 803-737-0800 Fax: 803-737-0895 fbelser@regstaff.sc.gov** **Phone: 803-737-0800 Fax: 803-737-0895 fbelser@regstaff.sc.gov** **Phone: 803-252-3300 Fax: 803-256-8062 bmustian@willoughbyhoefer.com** **Phone: 803-252-3300 Fax: 803-256-8062 bmustian@willoughbyhoefer.com** **Phone: 803-256-8062 bmustian@willoughbyhoefer.com** **Phone: 803-252-3300 Fax: 803-256-8062 bmustian@willoughbyhoefer.com** **Phone: 803	I, Carrie A. Schurg, an em	aployee of Austin & Roge	ers, P.A., certify that I electronically
mail and U.S. Mail, as addressed below, on March 18, 2011. Representing Woodland Utilities, Incorporated Benjamin P. Mustian Willoughby & Hoefer, P.A. Title: Counsel Representing Office of Regulatory Staff Florence P. Belser Office of Regulatory Staff Columbia, SC 29201 Representing Palmetto Wastewater Reclamation, LLC John M.S. Hoefer Willoughby & Hoefer, P.A. Title: Counsel Post Office Box 8416 Columbia, SC 29201 Phone: 803-252-3300 Fax: 803-737-0800 Fax: 803-737-0895 fbelser@regstaff.sc.gov Phone: 803-737-0800 Fax: 803-737-0895 fbelser@regstaff.sc.gov Phone: 803-252-3300 Fax: 803-256-8062 jhoefer@willoughbyhoefer.com Columbia, SC 29202-8416 Columbia, SC 29202-8416 Columbia, SC 29202-8416	mailed a copy of the Corresponde	ence, Cover Sheet, Happy	y Rabbit's Petition to Intervene and
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Post Office Box 8416 Columbia, SC 29202 Fax: 803-252-3300 Fax: 803-256-8062 bmustian@willoughbyhoefer.com Fax: 803-256-8062 bmustian@willoughbyhoefer.com Fax: 803-256-8062 bmustian@willoughbyhoefer.com Florence P. Belser	mail and U.S. Mail, as addressed	below, on March 18, 20	11.
Florence P. Belser Office of Regulatory Staff Title: Counsel Representing Palmetto Wastewater Reclamation, LLC John M.S. Hoefer Willoughby & Hoefer, P.A. Title: Counsel Post Office Box 8416 Columbia, SC 29202-8416 Post Office Box 8416 Columbia, SC 29202-8416 Columbia, SC 29202-8416 Phone: 803-737-0800 Fax: 803-725-8062 jhoefer@willoughbyhoefer.com	Incorporated Benjamin P. Mustian Willoughby & Hoefer, P.A.	·	Fax: 803-256-8062
Reclamation, LLC John M.S. Hoefer Willoughby & Hoefer, P.A. Title: Counsel Post Office Box 8416 Columbia, SC 29202-8416 Phone: 803-252-3300 Fax: 803-256-8062 jhoefer@willoughbyhoefer.com /S/	Florence P. Belser Office of Regulatory Staff	1401 Main Street, Suite 900	Fax: 803-737-0895
AA 490	Reclamation, LLC John M.S. Hoefer Willoughby & Hoefer, P.A.	나타는 그렇게 그리고 있다고 하다. 그런 그리고 있다면 되었다. 맛있다	Fax: 803-256-8062
March 18, 2011 Austin & Rogers, P.A.			Carrie Schurg